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HOUSTON PUBLIC LIBRARY

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Barbara A.B. Gubbin
Director

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May 28, 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Common Carrier Bureau
Regina M. Keeney
Bureau Chief
Federal Communications Commission
Washington, D.C. 20554

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Dear Ms. Keeney:

The Houston Public Library endorses the ALA response to the FCC NPRM on universal service. The major points of the ALA filing effectively address the concerns of the Houston Public Library (HPL) and the Houston Area Library Automated Network (HALAN), which is operated by HPL and serves nine libraries scattered across two counties. At this time, only the Central library of HPL can search the World Wide Web using a graphical browser such as Netscape or Mosaic. All fifty of our remote libraries and branch libraries are restricted to using Lynx, which gives them access to only the text of information that is available on the Internet. This is not always sufficient. For example, a subscription to Britannica Online is less effective in our remote libraries because the pictures and graphics which are an integral part of many encyclopedia articles cannot be retrieved. Graphics are frequently informational rather than merely decorative and are required to provide full information to library patrons.

One of the primary reasons for the inability to provide graphics or any sort of online multimedia applications at our remote libraries is the lack of funds to purchase sufficient bandwidth. Even our smaller libraries require a minimum of a 56kb line to support these applications on multiple library workstations. We believe that it is important to offer our patrons the broadest access possible to electronic information, so the Houston Public Library recently decided to include access to the World Wide Web at every public access catalog workstation. Because of the number of microcomputers at every library for the public and staff members, a T1 may be required in many locations. An expansive definition of discounted services for libraries and schools which includes all telecommunications services available commercially or by tariff or through contract would aid in correcting this situation.

The HALAN member libraries are also very interested in working with local schools and universities to provide distance learning opportunities for their public. Several of the HALAN libraries are more than a two hour drive from Houston and the ability to offer video classes

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would broaden the educational opportunities available in their area. The distance between the HALAN libraries also makes it difficult for them to meet to share information or learn about new software available on our network. The ability to offer video classes and conferences would enable us to properly train staff members at various locations, many of whom are not able to come to Houston for training. Although it is possible to send trainers to remote sites, over half the day may be spent in travelling to and from these libraries, which dramatically reduces the amount of time available for training. Libraries and schools in rural, insular and high-cost areas should receive deeper discounts because of the special barriers to affordable connections.

A discount rate which is similar to a wholesale price and covers the cost of the service or the lowest cost available is needed. This discount rate would be based on the Total Services Long Run Incremental Costs (TS-LRIC) of a service. The costs for libraries within one LATA and served by Southwestern Bell are now quite reasonable in Texas. Unfortunately, this does not help many of our libraries. Just among the HALAN members there are six libraries that will pay significantly higher costs for digital service. A T1 between the Houston Public Library and Pasadena would be a flat fee from Southwestern Bell of \$260 per month with no installation fee. A T1 between Houston and Beaumont would be almost \$1,000 per month, although both cities are served by Southwestern Bell, because they are not in the same LATA. A T1 between Houston and Baytown would be almost \$600 per month because Baytown is served by GTE rather than Southwestern Bell.

Many of our libraries simply cannot find an additional \$600 to \$1,000 per month in their budgets. Additional funding to cover the increased telecommunications costs would probably have to come from within the library's current budget, necessitating a decrease elsewhere in the budget. Since the line in the budget for books and other library materials is frequently chosen when a budget decrease is necessary, paying the increased cost for the required bandwidth would result in fewer new materials being purchased for the library users.

Most libraries in our area have extremely tight budgets with no immediate prospects for significant budget increases. Additional funding for additional telecommunications services is unlikely. It is for this reason that a number of HALAN member libraries are still using analog lines for data. Although the analog lines are insufficient, giving service that is less reliable and that cannot accommodate the transmission of graphics or video to multiple workstations within the library, it is all that some of our libraries can afford.

The definition of Universal Service should be reviewed frequently as new technologies appear and change and libraries determine the need to offer new functionalities to the public. Certification and eligibility requirements should not be onerous, provide accountability, and include libraries and schools that participate in appropriate cooperative network arrangements.

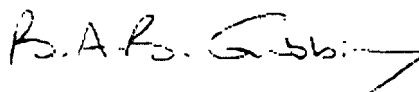
The Houston Area Library Automated Network include ten libraries, nine public libraries and one junior college library. HALAN provides access to a broad variety of databases through

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HALAN, the CARL network, and the Internet. Most of the databases offered to the library users are located on computers in other parts of the country. Although our remote libraries currently have access to only text databases, these resources are heavily used and appreciated by the library users. Students at Lee College and patrons at all of the HALAN public libraries can now search the catalogs of local public libraries, electronic periodical indices, an electronic encyclopedia, and a multitude of Internet resources. The small libraries in the HALAN consortium can only afford to offer all of these resources because of the special pricing and the access provided through the consortium. If funds can be found to upgrade the network and provide additional bandwidth, the library users will have a greatly increased number of resources from which to choose.

The users of all libraries in the Houston Area Library Automated Network have dialup access to the catalogs of all HALAN and CARL libraries and a number of licensed and free databases available on these networks. Library users in Jefferson County dial into a modem pool in Port Neches and then connect to our network through the leased line which connects Port Neches to Houston. This allows the service to be offered in all four Jefferson County locations without the library user paying for a long distance call. Library users in Harris County dial directly into a modem pool located at the Houston Public Library. Although the Houston Public Library and HALAN databases are available on the Internet, through telnet or the World Wide Web, many library users do not have access to this technology. Core universal services for the residential consumers should be defined, at the very least, as the level of technology required for entry level access to the Internet.

Sincerely,



Barbara A.B. Gubbin
Director

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